

REMARKS

As a preliminary matter, Applicants have enclosed herewith a corrected Sheet 2 of the Form PTO-1449 that was originally filed on September 9, 2003. The corrected Form PTO-1449 corrects a typographical error related to United States Patent No. 6,028,653 to Nishida (which was originally erroneously listed as Patent No. 6,208,653). Acknowledgement of the consideration of the United States Patent No. 6,028,653 is respectfully requested.

As an additional preliminary matter, Applicants appreciate the Examiner's indication that Claim 58 has been allowed and that Claim 70 contains allowable subject matter and would be allowed if amended into independent form. For the reasons set forth below, Applicants respectfully submit that the other pending claims are also allowable.

Claims 16 and 29 stand objected to due to informalities related to the language reciting that the electrodes are parallel "along a surface of each of the substrates." The Examiner appears to misunderstand the phrase at issue to mean that the first and second groups of electrodes are provided only in the same layer. However, the phrase at issue actually means that the electrodes extend *along the surface direction of each of the substrates*, i.e., the phrase does not indicate that the electrodes are provided only in the same layer. Accordingly, for the reasons discussed above, withdrawal of this objection is respectfully requested.

Applicants would like to take this opportunity to clarify what Claims 16 and 29 are intended to define. Claims 16 and 29 are not intended to be limited to embodiments in which the first and second groups of stripe electrodes are on the same layer of the substrate (such as shown in Figure 32) to the exclusion of embodiments with the electrodes on different layers (such as shown in Figure 33). Instead, Claims 16 and 29 are intended to cover both the Figure 32 embodiment and the Figure 33 embodiment. The features Applicants intended to define with the language added in Amendment C relate to the first and second groups of stripe electrodes being alternately provided in parallel to each other, such that the first and second groups of stripe electrodes do not overlap each other. Figures 32 and 33 show examples of embodiments that include such features, where the first group of stripe electrodes is represented by reference number 22a and the second group of stripe electrodes is represented by reference number 22b. Other embodiments covered by Claims 16 and 29 are also shown and described in the current specification, such as in Figures 72, 73, 74, and 78, and the related descriptions (such as on page 57 (line 9) to page 5 (line 16)).

Claims 29 and 71 stand rejected under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. Applicants respectfully traverse this rejection.

As mentioned above, Claim 29 does not require, that the first and second groups of stripe electrodes are in the same layer, as discussed above. Examples of the disclosure of embodiments in which the insulation layer has been removed in the vicinity of

at least one of the first and second groups of stripe electrodes can be found in Figures 72, 73, 74, and 78, and their related descriptions. Accordingly, as the original Specification adequately supports independent Claim 29 and associated dependent Claim 71, withdrawal of this §112; first paragraph, rejection is respectfully requested.

Claim 71 stands rejected under 35 U.S.C. §112, second paragraph, for allegedly being indefinite by failing to particularly point out and distinctly claim the subject which Applicants regard as the invention. Applicants respectfully traverse this rejection.

The language of Claim 71 recites that one of the first and second groups of electrodes is exposed to the liquid crystal. Thus, one of these groups of electrodes contacts the liquid crystal, without any intervening layer. *See* Specification, page 58 (paragraphs 2, 4 and 5) and Figures 73 and 74. Accordingly, since the language of Claim 71 is clear, withdrawal of this rejection is respectfully requested.

Claims 16, 68 and 69 stand rejected under 35 U.S.C. §103 as being unpatentable over United States Patent No. 6,052,168 to Nishida et al. in view of United States Patent No. 5,977,562 to Hirakata et al. and further in view of United States Patent No. 6,812,985 to Oh et al. Applicants respectfully traverse this rejection.

Applicants respectfully submit that the cited references fail to disclose or suggest all of the features of the present invention. In particular, the cited references, alone or in combination, fail to disclose or suggest a liquid crystal display apparatus that includes, *inter alia*, first and second groups of stripe electrodes “which are in parallel to each other

along a surface of each of the substrates and are alternately provided,” as defined in amended independent Claim 16.

One example of an embodiment that includes the features of independent Claim 16 is shown in Applicants’ Figure 33, which includes a first group of stripe electrodes 22a (with only one electrode of the group being shown) and a second group of stripe electrodes 22b (with only one of the group being shown), which first and second groups of electrodes are in parallel to each other along a surface of each of the substrates and are alternately provided, as recited in Claim 16.

In contrast, the electrodes of the Nishida et al. reference are not along with the surface of each substrate. As can be seen in Figure 5 of Nishida et al., electrodes 2, which the Examiner equated with the claimed first group, and electrode 1, which the Examiner equated with the second group, are provided along the thickness direction (and not the surface direction) of the substrate. Accordingly, the features of Claim 16 are not met by Nishida et al. The Hirakada et al. reference does not remedy this deficiency, nor does it include electrodes that are parallel to each other. Additionally, the Oh et al. reference does not remedy this deficiency either, nor was it relied upon as such. Further, the Hirakada et al. reference and the Oh et al. reference are also different from the present invention because they do not disclose or suggest an IPS liquid crystal display apparatus whose contrast does not decrease in an oblique direction on account of the use of a vertical alignment film. Thus, as all of the features of independent Claim 16 are not disclosed or suggested in the cited

references, Applicants respectfully request the withdrawal of this §103 rejection of independent Claim 16 and associated dependent Claims 68 and 69.

Claim 17 stands rejected under 35 U.S.C. §103 as being unpatentable over Nishida et al., Hirakata et al., and Oh et al., and further in view of United States Patent No. 5,600,464 to Ohe et al. Applicants respectfully traverse this rejection.

Claim 17 depends from independent Claim 16, and therefore includes all of the features of Claim 16, plus additional features. Accordingly, Applicants respectfully request that the §103 rejection of dependent Claim 17 under Nishida et al., Hirakata et al., and Oh et al., and further in view of United States Patent No. 5,600,464 to Ohe et al. be withdrawn considering the above remarks directed to independent Claim 16, and also because the Ohe et al. reference fails to remedy the deficiencies noted above, nor was it relied upon as such.

Claims 65 and 66 stand rejected under 35 U.S.C. §103 as being unpatentable over Nishida et al., Hirakata et al., Oh et al., and Ohe et al., and further in view of United States Patent No. 6,272,903 to Shin et al. Applicants respectfully traverse this rejection.

Claims 65 and 66 depend, directly or indirectly, from independent Claim 16, and therefore include all of the features of Claim 16, plus additional features. Accordingly, Applicants respectfully request that this §103 rejection of dependent Claims 65 and 66 be withdrawn considering the above remarks directed to independent Claim 16, and also because the Shin et al. reference fails to remedy the deficiencies noted above, nor was it relied upon as such.

Claims 29 and 71 stand rejected under 35 U.S.C. §103 as being unpatentable over Nishida et al., Hirakata et al., Oh et al., and Shin et al. and further in view of United States Patent No. 6,177,970 to Kim et al. Applicants respectfully traverse this rejection.

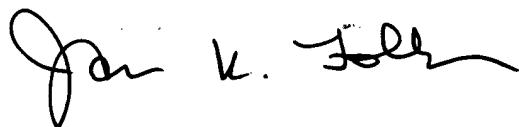
Independent Claim 29, includes language similar to that found in independent Claim 16, with regard to the issues discussed above. Accordingly, for the same reasons discussed above with regard to Claim 16, Applicants respectfully request the withdrawal of this rejection of independent Claim 29 and associated dependent Claim 71.

For all of the above reasons, Applicants request reconsideration and allowance of the claimed invention. Should the Examiner be of the opinion that a telephone conference would aid in the prosecution of the application, or that outstanding issues exist, the Examiner is invited to contact the undersigned.

Respectfully submitted,

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